

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ADRIAN HEILBUT, JESSE BRODKIN,
ENEAS MILIORIS,

Plaintiffs,

DAVID BREDDT and GEOFFREY PITT

Intervenor Plaintiffs

v.

CASSAVA SCIENCES, INC., REMI
BARBIER, and LINDSAY BURNS,

Defendants.

Civil Action No. 1:24-cv-05948-JLR-
OTW

Magistrate Judge Ona T. Wang

JOINT PROPOSED AGENDA FOR MAY 20, 2025 STATUS CONFERENCE

Pursuant to the Court's order on April 30, 2025 (Dkt. No. 106), Plaintiffs Dr. Adrian Heilbut, Dr. Jesse Brodtkin, and Dr. Eneas Milioris (the "Plaintiffs"), Intervenor Plaintiffs Dr. David Breddt and Dr. Geoffrey Pitt (the "Intervenor Plaintiffs"), and Defendants Cassava Sciences, Inc. ("Cassava"), Remi Barbier, and Dr. Lindsay Burns, by and through their undersigned counsel, respectfully submit the following agenda for the status conference on May 20, 2025.

1. Status of discovery, including what discovery has been done, what discovery remains, and how the parties plan to complete that discovery in a timely manner.
 - a. Plaintiffs and Intervenor Plaintiffs
 - b. Cassava Defendant and Individual Defendants
2. Schedule
 - a. Joint proposal to extend discovery deadlines by eight weeks, including fact discovery/deposition deadline from July 3, 2025 to August 29, 2025; expert discovery/all discovery deadline from August 28, 2025 to October 24, 2025; and corresponding extensions or adjournments of interim dates in the initial Case Management Order (Dkt. No. 42), as follows:
 - (i) Plaintiffs' and Intervenor-Plaintiffs' expert disclosures by September 12, 2025;

- (ii) Defendants' rebuttal expert disclosures by October 10, 2025.
 - b. If these extensions are granted, an adjournment of the post-discovery conference, scheduled for September 25, 2025 (Dkt. No. 42, ¶¶ 14, 21), to a date that pleases the Court would also be appropriate.
 - c. No prior extensions of the schedule have been requested or granted.
- 3. Proposed Protective Order (Dkt. Nos. 98-99)
 - 4. Discovery dispute concerning transactions or trades of Cassava securities, including why the discovery sought is or is not relevant to the claims or defenses in this action and proportional to the needs of this case. (See Dkt Nos. 81 and 84.)
 - 5. Discovery dispute concerning subpoenas of non-parties Matthew Nachtrab, Dr. Charles Spruck, and Sitrick and Company, including why the discovery sought is or is not relevant to the claims or defenses in this action and proportional to the needs of this case. (See Dkt Nos. 87, 89, 104, and 105.)

Dated: May 15, 2025

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